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10	UNITED STATES DISTRICT COURT		
11	NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION		
12	WAYMO LLC,	CASE NO. 3:17-cv-00939-WHA	
13	Plaintiff,	DECLARATION OF DAVID A. PERLSON	
14	vs.		
15	UBER TECHNOLOGIES, INC.;		
16	OTTOMOTTO LLC; OTTO TRUCKING LLC,		
17	Defendants.		
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		Case No. 3:17-cv-00939-WHA	

DECLARATION OF DAVID A. PERLSON

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27 28 I, David A. Perlson, hereby declare as follows.

- 1. I am a member of the bar of the State of California and a partner with Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Plaintiff Waymo LLC ("Waymo"). I make this declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently as follows.
- 2. On May 17, 2017, I participated in a telephonic conference with Arturo Gonzalez, counsel for Defendants Uber and Ottomotto, Neel Chatterjee, counsel for Otto Trucking LLC and Special Master John Cooper regarding the proposed Protocols submitted by the parties. During the telephonic conference Mr. Gonzalez said that Anthony Levandowski may continue to work with Velodyne output data as part of his role and responsibilities at Uber.
- 3. On May 19, 2017, I participated in another meet and confer with Special Master Cooper and counsel for Defendants Uber, Ottomotto, and Otto Trucking. During that meet and confer, counsel for Otto Trucking represented that Mr. Levandowski is an officer of Otto Trucking.
- 4. Attached hereto as Exhibit A is a true and correct copy of Waymo's Corrected Proposed Protocols Pursuant to Paragraph 7, Page 26 Of The Court's Order Granting In Part And Denying In Part Plaintiff's Motion For Provisional Relief. The version submitted hereto includes minor modifications from the version submitted to Special Master Cooper on May 15, 2017, to correct citations to docket numbers and identification of corporate entities.
- 5. Attached hereto as Exhibit B is a true and correct copy of a May 15, 2017 email from Wendy Ray, counsel for Defendants Uber Technologies, Inc. ("Uber") and Ottomotto, LLC ("Ottomotto") providing Uber's "proposed protocol."
- 6. Attached hereto as Exhibit C is a true and correct copy of Defendants Uber and Ottomotto's Objections to Waymo's Proposed Protocol.
- 7. Attached hereto as Exhibit D is a true and correct copy of Waymo's Objections to Defendants' proposed protocol.
- 8. Attached hereto as Exhibit E is a true and correct copy of Special Master Cooper's Proposed Order that includes Waymo's proposed changes in redline.

9. Attached hereto as Exhibit F is a true and correct copy of a May 18, 2017 email	
from Special Master Cooper to the parties clarifying that "the protocol should read 'self driving	
vehicle' not 'self driving automobile.'"	
10. Attached hereto as Exhibit G is a true and correct copy of a May 17, 2017 email	
from James Judah, counsel for Waymo, providing additional objections and comments to the	
proposed protocol Uber included as part of its Objections to Waymo's Proposed Protocol.	
11. Attached hereto as Exhibit H is a true and correct copy of Defendant Otto Trucking	
LLC's Objections to Waymo's Proposed Protocol.	
12. Attached hereto as Exhibit I is a true and correct copy of a May 13, 2017 email	
from Special Master Cooper, subject Re: Activity in Case 3:17-cv-00939-WHA Waymo LLC v.	
Uber Technologies, Inc. et al Order Granting Motion to File Under Seal.	
I declare under penalty of perjury under the laws of the State of California and the United	
States of America that the foregoing is true and correct.	
DATED: May 19, 2017 /s/ David A. Perlson	
SIGNATURE ATTESTATION	
Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the	
filing of this document has been obtained from David A. Perlson.	
Charles K. Verhoeven	